

EXHIBIT I

MAZIE SLATER KATZ & FREEMAN, LLC
COUNSELLORS AT LAW
103 Eisenhower Parkway
Roseland, NJ 07068
(973) 228-9898
Fax (973) 228-0303
www.mazieslater.com

David A. Mazie*
Adam M. Slater*^o
Eric D. Katz*^o
David M. Freeman
Beth G. Baldinger
Matthew R. Mendelsohn^o

Karen G. Kelsen^o
Cheryll A. Calderon
David M. Estes
Adam M. Epstein^o
Michael R. Griffith^o
Matthew Tonzola
Christopher J. Geddis

*Certified by the Supreme Court of
New Jersey as a Civil Trial Attorney

^oMember of N.J. & N.Y. Bars

December 2, 2019

VIA EMAIL

SAGoldberg@duanemorris.com

Seth A. Goldberg, Esq.
Duane Morris LLP
30 South 17th Street
Philadelphia, Pennsylvania 19103-4196

**RE: *In re Valsartan Products Liability Litigation*, No. 1:19-md-02875
Plaintiffs' Preliminary Custodian List**

Dear Counsel:

Plaintiffs are in receipt of your November 27, 2019 letter. As that letter recognizes, you represent four defendants in this case, and those defendants own either the entirety or the majority of two other significant non-parties. Moreover, your clients have hired numerous consultants to address the manufacturing and contamination issues in this case. Your primary position appears to be that Plaintiffs should be confined to an arbitrarily established number of custodians. Plaintiffs cannot agree to an arbitrary number of custodians. The question is which custodians should be searched to ensure the identification and production of the relevant, probative documents. Moreover, Plaintiffs have very limited knowledge about the proposed custodians with the exception of the basic information provided by the Defendants to date, which is far too limited for

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Plaintiffs to make knowledgeable selections as between custodians who appear to be relevant based on our limited information.

Notwithstanding, Plaintiffs have considered your November 27, 2019 letter and have revised the proposed list of custodians based on our continued analysis, which is enclosed. As you will see, Plaintiffs removed fourteen additional custodians, which are listed in a second enclosed document, and added four other custodians, who were determined to be necessary based on the continued analysis. Plaintiffs' amended list is subject to the same requests, qualifications, and reservations as the previously served ones.

In response to your requests for additional information regarding three custodians: (1) Plaintiffs note that Qing Wang may go by Wangqing, and that person is listed as a user on the chromatograms on the December 2013 solvent change submission to the FDA. PRINSTON00073055; (2) Plaintiffs believe that Min Xang is duplicative of either Min Lu or Min Xu (both in the same department);¹ and (3) Wei Tian was previously identified on the Prinbury website, but no longer is (please advise as to the reason for removal of this name from the website). Nevertheless, Wei Tian's title and Prinbury's work on Valsartan establish that Wei Tian is likely to have worked on Valsartan related issues and potentially had involvement in and/or is knowledgeable as to how it was tested, among other things. We would appreciate more detailed information to evaluate this potential custodian (as with the others you are objecting to).

¹ Plaintiffs removed "Min Xang" and all other duplicative custodians from the list without counting them as withdrawals, but we need your confirmation that our assumption is correct. As you probably know, the difficult pronunciations and different spellings of the names in this case has made duplications more difficult to identify. Plaintiffs appreciate your help in this regard.

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Plaintiffs believe that an additional telephonic meet and confer would be helpful, and we continue to request that you produce clearly relevant documents identifying the authors, recipients, language and terminology therein, to aid Plaintiffs in this ongoing effort to establish custodian and search term lists. Plaintiffs are available Wednesday after 2:30 p.m. EST. Please advise when you are available.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Adam M. Slater", written over a horizontal line.

ADAM M. SLATER

Encls.
Cc: Jessica Priselac, Esq.

Plaintiffs' Preliminary List of Custodians for ZHP and Its Subsidiaries as of 12/2/2019						
First name	Last name	Title	Department	Co.	Status	Explanation
Senior Management						
Jun	Du	Executive Vice President of ZHP, CEO of Huahai US, Princeton, Solco, and PrinJohnson		See Title Cell	Disputed	Identified in Princeton's core document production more times than we can reference. Most senior manager involved in the day-to-day aspects of management for ZHP, Princeton, & Huahai US. Fully involved in valsartan contamination issues from initial reporting to FDA to present. Identified as a planned attendee in Princeton's 6.18.18 Email Meeting Request to FDA initially advising the FDA of Valsartan's contamination (PRINSTON00000050). Led ZHP's investigation & response to the FDA's 483 observations made during the FDA inspection of Chuannan site 7.23.18 to 8.3.18 (PRINSTON0075644)
Baohua	Chen	Chairman and General Manager		ZHP and PrinJohnson	Disputed	He is the most senior officer in ZHP, and was the chairman of the board of directors. He was involved in a high level into the valsartan contamination investigation. Jun Du reports directly to him.
Analytical						
Min	Li	VP	Analytical Operations	ZHP	Agreed	
Minfa	Wang	VP	Analytical Operations and Quality Control	ZHP/Princeton	Disputed	She is a senior officer of Princeton, in charge of Analytical Operations and Quality Control. Identified as a planned attendee in Princeton's 6.18.18 Email Meeting Request to FDA initially advising the FDA of Valsartan's contamination (PRINSTON00000050).
Qing	Wang or possibly just Wangqing			ZHP	P - 10.8.19	Is listed as a user on the chromatograms on the December 2013 solvent change submission to the FDA PRINSTON00073055
Dachuan	Zhao	VP of ZHP, Executive Deputy General Manager of Prinbury	Analytical, Shanghai R&D Center	ZHP	P - 11.12.19	Attended close out meeting on 5.19.17 regarding FDA inspection PRINSTON0074158; "Dr. Zhao has comprehensive and in-depth understanding and rich experience in key areas such as product development (QbD), analysis, product declaration, quality control, quality assurance, FDA regulations, and FDA audits." -Prinbury website (via Google Translate). Identified in core discovery as Vice President. Analytical, Shanghai R&D Center PRINSTON0076915
XiaXia	Zhang (alternatively, it may be Kuang)	Analytical and Testing Department Manager	Chuannan Branch Analytical Center	ZHP	P - 11.22.19	Org Chart. Also referenced in the text version of PRINSTON0076941.
Jun	Wang	Finished Dose Gase Stage Team	Chuannan Branch Analytical Center	ZHP	P - 11.22.19	Org Chart; involved in testing tetrazole reaction in Valsartan PRINSTON0074146
Chun	Yang	Finished Dose Liquid Phase Team	Chuannan Branch Analytical Center	ZHP	P - 11.22.19	Org Chart.
Guang	Zheng	Raw Material Central Control Instrument Team	Chuannan Branch Analytical Center	ZHP	P - 11.22.19	Org Chart.
XianLiang	Zhang	Raw Material Central Control Physico-Chemical Team	Chuannan Branch Analytical Center	ZHP	P - 11.22.19	Org Chart.
Quality						
Wei	Cheng	VP	API Quality Assurance	ZHP	Agreed	
Remonda	Gergis	VP	Quality Assurance	Princeton	Agreed	
Zheng	Youqing	Deputy Manager	Quality Assurance	ZHP	P - 10.8.19	Executed numerous CGMP certifications re Valsartan. See, e.g. PRINSTON00038190
Jucai	Ge	Director	Quality Assurance (API Division-Chuannan Site)	ZHP	Agreed	
Yuelin	Hu	Assistant Director	Quality Assurance Manager (API Division-Chuannan Site, East Zone)	ZHP	Agreed	
Ziqiang	Gu	Independent Consultant		ZHP and Princeton	P - 10.8.19	Ind. consultant & former FDA inspector retained by ZHP to assess ZHP's quality management systems (See PRINSTON0073197 & 0073199 & 70478); zgu@comcast.net
Xiaohong	Zhao	Director	Quality Assurance (Chuannan Site)	ZHP	Disputed	Part of core ZHP group identified as meeting attendees in Duane Morris 6.21.19 corr to FDA (PRINSTON00073192)
Hongliang	Wang		Quality Assurance	ZHP	Disputed	Prepared Method Validation Report of Valsartan PRINSTON00031401; Check significant tests for Valsartan impurities See, e.g., PRINSTON00023107; reviewed Method Validation Report of Valsartan for correctness and integrity PRINSTON00022665
Baozhen	Chen	Director	Corporate Quality Assurance	ZHP	Agreed	
Cunxiao (Jenson)	Ye	Vice President	Quality Assurance, Headquarters	ZHP	Disputed	Attended close out meeting on 5.19.17 regarding FDA inspection PRINSTON0074158; Approved the Deviation Investigation Reports of Valsartan TEA Process PRINSTON0073443, etc.
Cai Feng	Zhao	Manager	Quality Assurance	ZHP	Disputed	Principal Author of ZHP's 11.5.18 Deviation Investigation Report of Valsartan TEA Process V1, 2, & 3 PRINSTON0073443, 0073797, 0076100
Dongqin	Wang	Assistant Director	Quality Assurance at Chuannan Site East Zone	ZHP	Agreed	
Zhizhang	Ding	Assistant Manager	Formulation Quality Assurance	ZHP	P - 11.12.19	Reviewed and approved Elemental Impurity Risk Assessment Report for Valsartan Tablets PRINSTON00036384; Signed off on corrected Valsartan Manufacturing Process PRINSTON00000471

Y.F.	Chen	Senior Supervisor	API Quality Assurance	ZHP	Disputed	Reviewed Validation Report of Analytical Method for Azide in Valsartan for correctness and integrity PRINSTON00018712; Reviewed and approved Validation Report of LC-MS Method for NDMA in Losartan Potassium PRINSTON0074642; reviewed and approved the Validation Report of LC-MS Method for NMBA in Irbesartan PRINSTON0074712
Xiong	Fei	Analyst	Quality Control	ZHP	P - 10.8.19	Analyst of Valsartan tests related to sodium nitrite PRINSTON00080367; 71698; 72721
Hu	Guangping	Director	Quality Control	ZHP	Disputed	QC Director regarding Valsartan tests related to sodium nitrite PRINSTON00072721
Huang	Rui	Director	Quality Control	ZHP	Disputed	Referenced in 35 separate documents in core document production, some regarding significant tests for impurities. See, e.g., PRINSTON00023107
Minli	Zhang	Director	Finished Dose Quality Assurance and Quality Control	ZHP	Agreed	
Qiangming	Li	Director	Quality Control (API Division-Chuannan Site)	ZHP	Agreed	
Xie	Chaojun	Analyst	Quality Control	ZHP	Disputed	QC Analyst referenced in several documents: PRINSTON00072692, 72743, and 00080383
Qiang	Zhou	Analyst	Quality Research	ZHP	Disputed	Drafted Validation Report of GC-MS Method for Detection of NDMA in Valsartan Tablets and Valsartan and Hydrochlorothiazide Tablets PRINSTON00000326, 36625
Yinhua	Tang	Assistant Director/Manager	Quality Control (API Division-Chuannan Site)	ZHP	P - 11.12.19	Reviewed and signed off on Deviation Investigation Reports of Valsartan TEA Process PRINSTON0073443, etc.; attended close out meeting on 5.19.17 regarding FDA inspection PRINSTON0074158
Shang	Fei	QP	Quality VP	ZHP	Disputed	Reviewed and approved the third version of the Deviation Investigation into the Valsartan TEA process PRINSTON0076100
Yun	Jin	Supervisor	Chuannan Quality Control	ZHP	P - 11.12.19	Drafted Assay Method Validation Report for Valsartan (Supplement) PRINSTON00009948; draft Chiral Purity Analytical Method Validation Protocol for TDCI Compound PRINSTON00077405
Tian	Zhang	Analyst	Chuannan Quality Control	ZHP	P - 11.12.19	Reviewed and signed off on Assay Method Validation Report for Valsartan (Supplement) PRINSTON00009948; reviewed and signed off on Chiral Purity Analytical Method Validation Protocol for TDCI Compound PRINSTON00077405
Xianhua	Zhang	Deputy Director	Chuannan Quality Control	ZHP	P - 11.12.19	Reviewed and signed off on Assay Method Validation Report for Valsartan (Supplement) PRINSTON00009948; reviewed and signed off on Chiral Purity Analytical Method Validation Protocol for TDCI Compound PRINSTON00077405
Yuping	Chen	Deputy Manager	Formulation Quality Control	ZHP	P - 11.12.19	Author of Elemental Impurity Risk Assessment Report for Valsartan Tablets PRINSTON00036384
Xiaoling	Li	Manager	Formulation Quality Control	ZHP	P - 11.12.19	Reviewed and signed off on Elemental Impurity Risk Assessment Report for Valsartan Tablets PRINSTON00036384
Tong	Wu	Analyst	API Quality Research	ZHP	Disputed	Drafted Validation Report of GC-MS Method for Detection of NDMA in Valsartan Tablets and Valsartan and Hydrochlorothiazide Tablets PRINSTON00000326, 93
Tan	Xiao	Senior Supervisor	API Quality Research	ZHP	P - 11.12.19	Drafted Validation Report of GC-MS Method for Detection of NDMA in Valsartan and Hydrochlorothiazide Tablets PRINSTON00000326; reviewed and approved Validation report of the LC-MS method for NDMA in Losartan Potassium PRINSTON0074642; reviewed and approved the Validation Report of LC-MS Method for NMBA in Irbesartan PRINSTON0074712
Wenbin	Chen	Analysis Director	API Quality Research	ZHP	Agreed	
Nan	Tong	Senior Supervisor	API Quality Research	ZHP	P - 11.12.19	Approved the cGMP compliance for its intended use of Report of GC-MS Method for Detection of NDMA in Valsartan and Hydrochlorothiazide Tablets PRINSTON00000326

Wenping	Hu	Team Leader	Quality Research	ZHP	Disputed	Reviewed data in Hydrochlorothiazide Residual Solvent Method Validation Report PRINSTON00064288; Reviewed Comparison of Valsartan USP Method and In-house Method for Integrity and Correctness PRINSTON00064389
Wenquan	Zhu	Director	API Quality Research	ZHP	Agreed	
X. G.	Liu	Quality Researcher	API Quality Research	ZHP	P - 11.12.19	Drafted Validation report of the LC-MS method for NDBA in Losartan Potassium PRINSTON0074642
Y.Y.	He	Quality Researcher	API Quality Research	ZHP	P - 11.12.19	Drafted Validation Report of LC-MS Method for NMBA in Irbesartan PRINSTON0074712
Jieyun	Wang	Director	Quality Assurance	ZHP	P - 11.22.19	According to the Valsartan DMF, "[s]he is responsible for QA/GMP auditing and the QC/GMP file management for all products" PRINSTON00077850; signed Valsartan cGMP Certification PRINSTON00077832
Jian	Ye	Deputy Manager, Group I	Quality Control	ZHP	P - 11.22.19	Org Chart; put into effect the Method Validation for Valsartan PRINSTON00070930
Houming	Zhou	General Detection, Technical Deputy Director	API Quality Study/Research Department	ZHP	P - 11.22.19	Org Chart
Xiao	Yu	Associate Director	API Quality Study/Research Department	ZHP	P - 11.22.19	Org Chart
Yang	Han	Supervisor	Quality Research	ZHP	P - 11.22.19	Org Chart
Chaochao	Bao	Supervisor	API QR	ZHP	P - 11.22.19	Prepared Comparison of Valsartan USP Method and In-house Method PRINSTON00064389; put into effect the Method Validation for Valsartan PRINSTON00022665
Jianzhi	Zhao		QA	ZHP	New	Audit consistency of document and GMP compliance in many documents See, e.g., throughout PRINSTON00022331-23004; PRINSTON00010056
Meng	Zheng	Manager	QA	ZHP	New	Signed cGMP Certification for Valsartan PRINSTON00022284
Manufacturing						
Xiaoming	Liu	Head	Technical for Finished Dose	ZHP	Agreed	
Yongjun	Jin	Factor Assistant Director	Manufacturing	ZHP	Disputed	Identified in Valsartan DMF as a "professional engineer," and "has a wide experience at production technology management and is responsible for the technological development of all bulk drugs" PRINSTON00077836
Peng	Dong	Deputy Director	Technical Department	ZHP	Agreed	
Peng	Wang	Senior Director	ZHP Facility Director API Manufacturing Chuannan Site, West Zone	ZHP	Agreed	
Youhu	Wang	Deputy Director of Production and Operation		ZHP	Disputed	Identified in Valsartan DMF as "responsible for Valsartan" PRINSTON00077836; appears in the text of later documents, such as ZHP's Response to the FDA's August 2018 inspection PRINSTON00074892
Jiangzhong	Yu	API and Intermediate Plant Manager	Manufacturing	ZHP	Disputed	Identified in Valsartan DMF as responsible for all bulk drugs (including intermediates) at ZHP PRINSTON00077836
Wenling	Zhang	Director Assistant	Technical, API Chuannan site West Zone (counterpart to Peng Dong)	ZHP	Agreed	
Lijin	Jiang	VP	API Operations/Facility Director, API Chuannan Site, East Zone	ZHP	Disputed	Attended close out meeting on 5.19.17 regarding FDA inspection PRINSTON0074158
Zhengjun	Jia	Deputy Plant Director	Engineering and Maintenance, API Chuannan site East Zone	ZHP	Disputed	Attended close out meeting on 5.19.17 regarding FDA inspection PRINSTON0074158
Junhui	Zuo	Deputy Plant Director	Engineering and Maintenance, API Chuannan site West Zone	ZHP	Disputed	Attended close out meeting on 5.19.17 regarding FDA inspection PRINSTON0074158
Wei	Chen	Deputy Director	Production Department	ZHP	Agreed	
Lina	Wu	Senior Supervisor	Formulation Technology at ZHP	ZHP	P - 11.12.19	Author of Elemental Impurity Risk Assessment Report for Valsartan Tablets and Valsartan and Hydrochlorothiazide Tablets PRINSTON00036384, 70161
Eric Wen-Chien	Tsai, PhD	General Manager		Prinbury BioPharm	P - 11.12.19	Authorized signatory and sponsor of Quality Assurance Authentication of Valsartan. PRINSTON00029811. Also Approved Method Validation Report on Identification, Assay, and Content Uniformity Determination of Valsartan PRINSTON00020808. "Eric joined Prinbury BioPharm as General Manager in 2009, wholly owned subsidiary of Princeton, a Research and Development center located in Shanghai China. In this role he leads the R&D efforts has been making significant contribution to Princeton pipeline growth. Eric came to the company with strong technical expertise and management skills." -Princeton Website
Chunmin	Xu	Vice President		ZHP	P - 11.22.19	Identified as Valsartan personnel in DMF PRINSTON00070584, 79392
Hu	Zhou	Factory Director		ZHP	P - 11.22.19	Identified as Valsartan personnel in DMF PRINSTON00070586
Ruqi	Yao	Factory Assistant Director		ZHP	P - 11.22.19	Identified as Valsartan personnel in DMF PRINSTON00070587, 79392
Kai	Yang	Technical Manager		ZHP	P - 11.22.19	Identified as Valsartan personnel in DMF PRINSTON00070587, 79392
Meng	Yanhua	General Manager	Chuannan Product Technical Center	ZHP	P - 11.22.19	Org Chart
Yan	Fengfeng	Director of Tech	Chuannan Product Technical Center	ZHP	Disputed	Org Chart
Liang	Zunjun	Associate Director	Chuannan Product Technical Center	ZHP	P - 11.22.19	Org Chart

Hu	Zhichen	Manager	Chuannan Product Technical Center	ZHP	P - 11.22.19	Org Chart
Zhan	Xiauhui	"(Valsartan)"	Chuannan Product Technical Center	ZHP	P - 11.22.19	Org Chart
Xie	Mengmeng	General Supporting Group	Chuannan Product Technical Center	ZHP	P - 11.22.19	Org Chart
Regulatory						
Lihong (Linda)	Lin	Director	Regulatory Affairs Department	ZHP	Agreed	
Zhi	Chen			Huahai US	Disputed	Listed as contact for ZHP's US Agent, Huahai US PRINSTON00072295
Yanfeng (Lucy)	Liu	Deputy Director / Manager	Regulatory Affairs	ZHP	Agreed	
Lijie	Wang	VP	Head of Regulatory Affairs	Prinston	Agreed	
Ying	Xiong	Supervisor	Regulatory Affairs	ZHP	Agreed	
Qun (Kathy)	Zhang	Senior Manager	Regulatory Affairs	Huahai US	Disputed	Author of Cover Letter re: Valsartan ANDA PRINSTON00066953-54; Listed as contact for the US Agent, Huahai US PRINSTON00073120; Same PRINSTON00072212
Xiaodi	Guo	Executive Vice President and Chief Scientific Officer for Prinston & Huahai US		Huahai US (linkedin), Prinston (website), and Solco (affidavits of service)	Agreed	
Wei (Helena)	Tong	Director	Regulatory Affairs	ZHP and Prinston?	Disputed	Listed on ANDA Documents, Signed ANDA, and routinely corresponded with the FDA. For example, PRINSTON00037372, PRINSTON00054685, PRINSTON00037385, PRINSTON00031790. Her full name appears in 106 documents from Core Discovery.
Ting (Ada)	Zhou	Assistant Director	Regulatory Affairs	ZHP	Agreed	
Guangyu	Luo	Associate (2013-2015), Senior Associate (2015-2016), Specialist (2016-2017), Manager (2017-Present)		Prinston	Disputed	Signed ANDA for Valsartan PRINSTON00066560, PRINSTON00033715, PRINSTON00034648, PRINSTON00066787, PRINSTON00066707, PRINSTON00066848; "Regulatory Affairs, mainly on regulatory submissions (from draft to e-CTD compilation), pharmacovigilance (AE handling and submission) and generic labeling (content, artwork and SPL)." -LinkedIn
Yiming	Tang				P - 11.22.19	Contact Person for ZHP's U.S. Agent PRINSTON0076915 and many other documents regarding Huahai US as ZHP's U.S. agent PRINSTON00010626, PRINSTON00008984, PRINSTON00078888, etc.
Sun	Dengxue	Manager	API R&D, Regulation Affairs	ZHP	P - 11.22.19	Org Chart
Jie	Lin	Deputy Manager	API Patent, Regulation Affairs	ZHP	P - 11.22.19	Org Chart
Ning	Zhang	Specialist	Regulatory Affairs	Prinston	New	Regulatory Affairs Approval for Corrected Valsartan Manufacturing Process PRINSTON00000479
Procurement						
Min	Hu		Purchasing	ZHP	Agreed	
Weiwei	Xu		Purchasing	ZHP	Agreed	
Min	Xu		Purchasing	ZHP	Agreed	
Zheng	Gaozhe		Purchasing	ZHP	Agreed	Was a person who was responsible for procuring solvents
API Sales						
Minda	Cai	Former VP	API Sales	ZHP	Agreed	
Jie	Wang	VP	Business Development	ZHP	Agreed	
Sheng	Zhong	Director	Business Development	ZHP	Agreed	
Hongchao	Li	Manager	Business Development	ZHP	Agreed	
Mi	Xu		Business Development, API Sales	ZHP	Agreed	
Yihua	Wang	Vice President	Sales	ZHP	Disputed	Org Chart
Tong	Zengyuan	Director of Customer Service Department	Sales	ZHP	P - 11.22.19	Org Chart
Fengyang	Tang	Manager Assistant	Sales	ZHP	Disputed	Org Chart
Lina	Wang	Manager Assistant	Sales	ZHP	Disputed	Org Chart
Li	Qing	Director of Original Drug, Key Account Business Department	Sales	ZHP	P - 11.25.19	Org Chart
Xu	Baoxi	Director Assistant	Sales	ZHP	P - 11.25.19	Org Chart
Wu	Yuehua	Manager of Document Group	Sales	ZHP	P - 11.25.19	Org Chart
Wang	Haiqun	Assistant Manager of Office Work Group	Sales	ZHP	P - 11.25.19	Org Chart
Other Sales						
John	Iozzia	Director	Sales	Huahai US	Agreed	
Chris	Keith	Senior Vice President / VP	Sales	Solco/Prinston at some point as	Agreed	
Lesley	Zhu	SVP, Business Development & Portfolio President since 2005	Sales	Prinston	Disputed	Received email from Frederick Ball re: FDA correspondence along with Jun Du; Same PRINSTON0073198; Cc'd on letter to FDA with Jun Du PRINSTON00079000; Sent letter to FDA re: authorizing the FDA to share information with the EMA PRINSTON00070470-71; PRINSTON0073192-96; Cc'd on letter to FDA with Jun Du PRINSTON00079001-02
Hai	Wang			Huahai US (linkedin),	Agreed	

Min (Michelle)	Hu	Manager of Business		Huahai US (2007-2012) and	Disputed	Linkedin
David	Ayres	Vice President (2018-Present);	Sales	Solco	Agreed	
Peng	Shang	Senior Associate of Business		Prinston	Disputed	Linkedin
Matthew	Arnold	National Account Manager from		Solco	Disputed	Linkedin and Author of Only Solco-stamped document, a list of Valsartan customers
Syncores						
Eric	Gu	Manager		Shanghai Syncores	P - 10.8.19	On list of planned attendees for meeting with FDA re: the contamination PRINSTON0073192-96
James (Jun)	Wen	President since 2005		Shanghai Syncores	P - 11.12.19	Linkedin. Jun Du said this company developed ZnCl2 process, which was used to produce the more recently contaminated Valsartan
Frank	Zhao	VP		Shanghai Syncores	P - 11.12.19	Linkedin. Jun Du said this company developed ZnCl2 process, which was used to produce the more recently contaminated Valsartan
Prinbury BioPharm Ltd.						
Ping	Wen	Executive Director		Prinbury	P - 11.12.19	"[L]ead[s] the R & D team consisting of doctors, senior scientists and chief scientists, developing high-throughput evaluation systems, hosting and participating in the development of multiple natural actives, OTC, 510K and macromolecular transdermal conduction assessment methods, products in Europe and the United States." -Prinbury Website (via Google Translate)
Yuanyuan	Xie	Director	Pharmaceutical Affairs	Prinbury	P - 11.12.19	"[Sh]e has nearly 10 years of experience in drug formulation development and product application approval. [Sh]e has insights and insights from prescription research of new and generic drugs to commercial production of drugs. Unique, especially good at first-dose exploration and development of new drugs for humans, proficient in pharmaceutical regulations and the entire process of R & D and production of generic drugs." -Prinbury website (via Google Translate)
Li or Lily	Tan	Director	Project Management	Prinbury	P - 11.12.19	Reviewed and Signed Off on Method Validation Report on Identification, Assay and Content Uniformity Determination of Valsartan PRINSTON00020805; Approved Method Verification Report for Valsartan PRINSTON00039715; Reviewed and signed off on Dissolution Comparison Study Report of Valsartan PRINSTON00029309; Approved Method Validation Report re: Dissolution Test of Valsartan and Hydrochlorothiazide PRINSTON 00039663; Approved Method Verification Report re: Identification and Assay Determination of Valsartan and Hyrdochlorothiazide PRINSTON00039439; Reviewed and Signed Off on Method Robustness Study Report re: Content Uniformity Determination of Valsartan and Hyrdochlorothiazide PRINSTON00039541; Approved Method Verification Report re: Organic Impurities Determination for Valsartan and Hyrdochlorothiazide PRINSTON00039715; Approved USP Method Equivalence Study Report re: Content Uniformity Determination of Valsartan and Hyrdochlorothiazide PRINSTON00039499; Approved Submission Batch Stability Study Report for Valsartan and Hyrdochlorothiazide PRINSTON00064193; Reviewed and Signed Off on Method Robustness Study Report re: Dissolution Determination of Valsartan and Hyrdochlorothiazide PRINSTON00039645; Approved Method Verification Report re: Dissolution Test of Valsartan and Hyrdochlorothiazide PRINSTON00039800; "12 years of experience in drug development, analysis, quality management and project management. Good at the establishment and management of quality system and project management system. Familiar with US FDA policies, regulations, cGMP specifications and ICH guidelines, and proficient in FDA registration requirements. Participated and successfully passed GMP audits of FDA, EMEA and CFDA." -Prinbury website (via Google Translate)
Wei	Tian	Deputy General Manager of Analysis and Research		Prinbury	P - 11.12.19	This person was previously on the Prinbury website, but no longer is. Wei Tian's title and Prinbury's work on Valsartan establish that Wei Tian is likely to have worked on Valsartan related issues and potentially had involvement in and/or is knowledgeable as to how it was tested, among other things.
Hongchun	Qiu	Deputy General Manager of Pharmaceutical Preparation Product Development		Prinbury	P - 11.12.19	"The team led by Dr. Qiu includes formulation formulation and formulation process research and development, commercial production, analytical research and development, new technology platform research and development and intellectual property layout, CDMO research and development and production services." -Prinbury website (via Google Translate)
Shine	Chen	Scientist		Prinbury	P - 11.12.19	Prepared Method Verification Report re: Identification and Assay Determination of Valsartan and Hyrdochlorothiazide PRINSTON00039439; Prepared Method Verification Report re: Organic Impurities Determination for Valsartan and Hyrdochlorothiazide PRINSTON00039715; Prepared Submission Batch Stability Study Report re: Valsartan and Hyrdochlorothiazide PRINSTON00064193; Prepared USP Method Equivalence Study Report re: Content Uniformity Determination of Valsartan and Hydrochlorothiazide PRINSTON00039499; Prepared Method Validation Report re: Content Uniformity Determination of Valsartan and Hyrdochlorothiazide PRINSTON00039560; Prepared Dissolution Comparison Study Report re: Valsartan PRINSTON00029309; Prepared USP Method Equivalence Study Report re: Dissolution Test of Valsartan and Hyrdochlorothiazide PRINSTON00039603; Prepared Method Robustness Study Report re: Dissolution Determination for Valsartan and Hyrdochlorothiazide PRINSTON00039645;
Tina	Liu	Senior Scientist		Prinbury	P - 11.12.19	Reviewed and Signed Off on Method Verification Report re: Identification and Assay Determination of Valsartan and Hyrdochlorothiazide PRINSTON00039439; Reviewed Method Verification Report re: Organic Impurities Determination for Valsartan and Hyrdochlorothiazide PRINSTON00039715; Prepared USP Method Equivalence Study Report re: Assay Determination of Valsartan PRINSTON00020861; Reviewed and Signed Off on Method Validation Report re: Dissolution Test of Valsartan and Hydrochlorothiazide PRINSTON00039663; Prepared Method Validation Report re: Organic Impurities Determination for Valsartan PRINSTON00020905; Reviewed and Signed Off on Dissolution Comparison Study Report for Valsartan and Hyrdochlorothiazide PRINSTON00050114; Reviewed and Signed Off on Submission Batch Stability Study Report re: Valsartan and Hyrdochlorothiazide PRINSTON00064193; Reviewed and Signed Off on USP Method Equivalence Study Report re: Dissolution Test of Valsartan and Hydrochlorothiazide PRINSTON00039603; Reviewed and Signed off on USP Method Equivalence Study Report re: Content Uniformity Determination of Valsartan and Hyrdochlorothiazide PRINSTON00039499; Reviewed and Signed Off on Method Verification Report re: Dissolution Test of Valsartan and Hyrdochlorothiazide PRINSTON00039800

						Approved Method Validation Report on Identification, Assay and Content Uniformity Determination of Valsartan PRINSTON00020805; Approved Method Verification Report re: Identification and Assay Determination of Valsartan and Hyrdochlorothiazide PRINSTON00039439; Approved Method Robustness Study Report re: Content Uniformity Determination of Valsartan and Hyrdochlorothiazide PRINSTON00039541; Approved Method Verification Report re: Organic Impurities Determination of Valsartan and Hyrdochlorothiazide PRINSTON00039715; Approved Dissolution Comparison Study re: Valsartan PRINSTON00029309; Approved Dissolution Comparison Study Report re: Valsartan and Hyrdochlorothiazide PRINSTON00050114; Approved Method Validation Report re: Dissolution Test of Valsartan and Hyrdochlorothiazide PRINSTON00039663; Approved USP Method Equivalence Study Report re: Dissolution Test of Valsartan and Hyrdochlorothiazide PRINSTON00039603; Approved USP Method Equivalence Study Report re: Content Uniformity Determination of Valsartan and Hyrdochlorothiazide PRINSTON00039499; Approved Method Validation Report re: Content Uniformity Determination of Valsartan PRINSTON000395560; Approved Submission Batch Stability Study Report for Valsartan and Hyrdochlorothiazide PRINSTON00064193; Approved Method Robustness Study Report re: Dissolution Determination for Valsartan and Hyrdochlorothiazide PRINSTON00039645; Approved Method Verification Report re: Dissolution Test of Valsartan and Hyrdochlorothiazide PRINSTON00039800; She "is responsible for the development and validation of analytical methods for pharmaceutical products. 11 years of experience in the analysis, development and quality control of APIs and pharmaceutical preparations. He is good at quality research and control in the drug development process of IND and NDA, including the relevant stability tests. Rich cGMP analysis laboratory team construction and management experience, familiar with FDA / EMEA cGMP regulations, and participated in multiple FDA, EMEA cGMP audits." -Prinbury website (via Google Translate)
Yun	Tian	Senior Director		Prinbury	P - 11.12.19	
Alex	Liu	Scientist		Prinbury	P - 11.12.19	Prepared Dissolution Comparison Study Report of Valsartan PRINSTON00050114; Worked extensively on USP Method Equivalence Study Report on Assay Determination of Valsartan PRINSTON00020861
Ashley	Lin	Associate Scientist		Prinbury	P - 11.12.19	Prepared Method Robustness Study Report for Content Uniformity Determination of Valsartan PRINSTON00039541; Prepared Method Validation Report for Dissolution Test of Valsartan and Hydrochlorothiazide PRINSTON00039663; Prepared USP Method Equivalence Study Report re: Dissolution Test of Valartan PRINSTON00021157
Yulu (Luke)	Wang	Executive Director		Prinbury	P - 11.12.19	Reviewed and approved many Master Production Batch Record Approval See, e.g., PRINSTON00064070, PRINSTON00063906, PRINSTON00063742, PRINSTON00038525
Angela	An	Scientist		Prinbury	New	Prepared Method Validation Report on Identification, Assay and Content Uniformity Determination of Valsartan PRINSTON00020805
Consultants						
Derek	Zhang, PhD			Atavanda Regulatory & Drug Development Consulting, Inc. (Regulatory Consultant for	D - 10.23.19	Attended July 9, 2018 meeting with FDA re: Valsartan Contamination PRINSTON00000492
Dylan	Yao, Ph.D.	Chief Scientific Officer & Senior Vice President		Jonn Laboratories Inc. (Consultant for Prinston Pharmaceutical Inc.)	D - 10.23.19	Attended July 9, 2018 meeting with FDA re: Valsartan Contamination PRINSTON00000492
Charles	Wang	VP of Drug Safety and DMPK		Consultant from InnoCare Pharma, Inc. for ZHP	D 10.23.19	According to Jun Du, he is a toxicology expert who conducted studies or analyses of the implication of the adulterations.
Douglas	Campbell	Independent Consultant		ZHP	P - 11.22.19	Email regarding cGMP consulting in response to 11/2018 Warning Letter PRINSTON00070408

Plaintiffs' List of Withdrawn Custodians for ZHP and Its Subsidiaries as of 12/2/2019				
First name	Last name	Title	Department	Co.
Juan	Tao	Director Assistant	Quality Assurance	ZHP
Xiaofen	Zhu	Analyst	Quality Control	ZHP
Hui	Dai	Analyst	Quality Control	ZHP
Jing	Jin	Deputy Manager	Quality Control	ZHP
J. Y.	Li	Analyst	Quality Control	ZHP
J.	Wang	Analyst	Quality Control	ZHP
Yingzhi	Chen	Analyst	Quality Control	ZHP
Chongjun	Xie	Analyst	Quality Research	ZHP
Jon M.	Bill, Jr.	VP & General Manager		Princeton Laboratories
Shuxi	Li	Technician	Formulation Technology at ZHP	ZHP
Pijie	Xu	Assistant Director	Formulation Manufacture	ZHP
Weildin g	Bian	Director	Forumulation Manufacture	ZHP
Xiaojun	Gao	Technician	Technology	ZHP
Zho	Cheng		Business Development	ZHP
Frank	Chen	Chief Investment Officer of Huahai US and CFO of PrinJohnson (according to PrinJohnson's Facebook)		Huahai US and PrinJohnson
Ping	Jiang	CFO (2015-2016)		PrinJohnson

Jane Qiu	X.	Senior Manager, Strategic Sourcing & Project Management		Princeton
Mark	Pierce	National Account Manager as of September 2019		Solco
Alan Huasheng	Ding	Director	Business Development	Shanghai Syncores
Luping	Liu	Vice President		Shanghai Syncores
Luke	Wang			Prinbury
Jihui	Wang	Technician		Prinbury
Fong E.	Zhuong	Associate Manager	Regulatory Affairs	ZHP
Dan Ping	Cai	Technical Assistant Director	Regulatory Affairs	ZHP
Yuanyan	Chen	Supervisor	Regulatory Affairs	ZHP
Yuding	Zhao	Director	Finished Dose RA	ZHP
Jack	Guan	Senior Director Analytical Operations	Unknown	Princeton
Louis	Zhao		Regulatory Affairs	Princeton
Xin (Will)	He	Scientist (2012- 2016), Manager (2019-Present)		Princeton
Xin	Geng	Post Doctoral Fellow and Research Scientist	Unknown	Hauahai US
Zhen	Ye		Quality	ZHP
Ying	Sung	Manager	Quality Control	ZHP
Congshe ng	Jin	Valsartan Workshop Director		ZHP
Pieter	Groene woud	Executive Director	Technology	ZHP

Ruping	Ren	Auxiliary Workshop Director		ZHP
Jenny	Lu	Senior Associate	Regulatory Affairs	Princeton